



## ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

### AIR QUALITY CLASS I PERMIT

**PERMITTEE:** El Paso Natural Gas Company, L.L.C.  
**FACILITY:** Willcox Compressor Station  
**PERMIT #:** 61325 (As revised by Significant Permit Revision No. 70818)  
**DATE ISSUED:** DRAFT  
**EXPIRY DATE:** March 3, 2020

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#### SUMMARY

This Class I operating permit is issued to El Paso Natural Gas Company, L.L.C. the Permittee, for the continued operation of the Willcox Compressor Station. The facility is located on Arzberger Road six miles east of Kansas Settlement Road, in Cochise County, Arizona. This is a renewal of Permit #48820.

A Class I permit is required because the facility has the potential to emit more than the major source threshold of nitrogen oxides.

This permit is issued in accordance with Arizona Revised Statutes (ARS) 49-426. It contains requirements from Title 18, Chapter 2 of the A.A.C. and Title 40 of the Code of Federal Regulations. All definitions, terms, and conditions used in this permit conform to those in the Arizona Administrative Code R18-2-101 et. seq. (A.A.C.) and Title 40 of the Code of Federal Regulations (CFR), except as otherwise defined in this permit.

#### Significant Permit Revision No. 70818

This significant permit revision authorizes construction and operation of a new natural gas compressor station located northeast of existing Willcox Compressor station. The compressor station shall consist of a centrifugal compressor driven by 13,000 hp (ISO) natural gas fired combustion turbine, and a natural gas fired emergency generator.

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## **ATTACHMENT “A”: GENERAL PROVISIONS**

### **Air Quality Control Permit No. 61325 (as revised by Significant Permit Revision No. 70818) For El Paso Natural Gas Company, L. L. C. - Willcox Compressor Station**

#### **I. PERMIT EXPIRATION AND RENEWAL**

[ARS § 49-426.F, A.A.C. R18-2-304.C.2, and -306.A.1]

- A.** This permit is valid for a period of five years from the date of issuance.
- B.** The Permittee shall submit an application for renewal of this permit at least 6 months, but not more than 18 months, prior to the date of permit expiration.

#### **II. COMPLIANCE WITH PERMIT CONDITIONS**

[A.A.C. R18-2-306.A.8.a and b]

- A.** The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona Revised Statutes (A.R.S.) Title 49, Chapter 3, and the and air quality rules under Title 18, Chapter 2 of the Arizona Administrative Code. Any noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
- B.** It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#### **III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE**

[A.A.C. R18-2-306.A.8.c, -321.A.1, and -321.A.2]

- A.** The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- B.** The permit shall be reopened and revised under any of the following circumstances
  1. Additional applicable requirements under the Clean Air Act become applicable to the Class I source. Such a reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless an application for renewal has been submitted pursuant to A.A.C. R18-2-322.B. Any permit revision required pursuant to this subparagraph shall comply with the provisions in A.A.C. R18-2-322 for permit renewal and shall reset the five-year permit term.
  2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be

incorporated into the Class I permit.

3. The Director or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
4. The Director or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.

- C.** Proceedings to reopen and reissue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall, except for reopenings under Condition III.B.1 above, affect only those parts of the permit for which cause to reopen exists. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in Condition III.B.1 above shall not result in a resetting of the five-year permit term.

#### **IV. POSTING OF PERMIT**

[A.A.C. R18-2-315]

- A.** The Permittee shall post this permit or a certificate of permit issuance where the facility is located in such a manner as to be clearly visible and accessible. All equipment covered by this permit shall be clearly marked with one of the following:
1. Current permit number; or
  2. Serial number or other equipment ID number that is also listed in the permit to identify that piece of equipment.
- B.** A copy of the complete permit shall be kept on site.

#### **V. FEE PAYMENT**

[A.A.C. R18-2-306.A.9 and -326]

The Permittee shall pay fees to the Director pursuant to ARS § 49-426(E) and A.A.C. R18-2-326.

#### **VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE**

[A.A.C. R18-2-327.A and B]

- A.** The Permittee shall complete and submit to the Director an annual emissions inventory questionnaire. The questionnaire is due by March 31st or ninety days after the Director makes the inventory form available each year, whichever occurs later, and shall include emission information for the previous calendar year.
- B.** The questionnaire shall be on a form provided by the Director and shall include the information required by A.A.C. R18-2-327.

#### **VII. COMPLIANCE CERTIFICATION**

[A.A.C. R18-2-309.2.a, -309.2.c-d, and -309.5.d]

- A.** The Permittee shall submit a compliance certification to the Director semiannually, which describes the compliance status of the source with respect to each permit condition. The first certification shall be submitted no later than May 15<sup>th</sup>, and shall report the compliance status of the source during the period between October 1<sup>st</sup> of the previous year and March 31<sup>st</sup> of the current year. The second certification shall be submitted no later than November

15<sup>th</sup>, and shall report the compliance status of the source during the period between April 1<sup>st</sup> and September 30<sup>th</sup> of the current year.

The compliance certifications shall include the following:

1. Identification of each term or condition of the permit that is the basis of the certification;
  2. Identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period,
  3. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in Condition VII.A.2 above. The certifications shall identify each deviation and take it into account for consideration in the compliance certification;
  4. For emission units subject to 40 CFR Part 64, the certification shall also identify as possible exceptions to compliance any period during which compliance is required and in which an excursion or exceedance defined under 40 CFR Part 64 occurred;
  5. All instances of deviations from permit requirements reported pursuant to Condition XII.B of this Attachment; and
  6. Other facts the Director may require to determine the compliance status of the source.
- B.** A copy of all compliance certifications shall also be submitted to the EPA Administrator.
- C.** If any outstanding compliance schedule exists, a progress report shall be submitted with the semi-annual compliance certifications required in Condition VII.A above.

#### **VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS**

[A.A.C. R18-2-304.H]

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

#### **IX. INSPECTION AND ENTRY**

[A.A.C. R18-2-309.4]

Upon presentation of proper credentials, the Permittee shall allow the Director or the authorized representative of the Director to:

- A.** Enter upon the Permittee's premises where a source is located, emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
- B.** Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

- C.** Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- D.** Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
- E.** Record any inspection by use of written, electronic, magnetic and photographic media.

**X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD**

[A.A.C. R18-2-304.C]

If this source becomes subject to a standard promulgated by the Administrator pursuant to Section 112(d) of the Act, then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

**XI. ACCIDENTAL RELEASE PROGRAM**

[40 CFR Part 68]

If this source becomes subject to the provisions of 40 CFR Part 68, then the Permittee shall comply with these provisions according to the time line specified in 40 CFR Part 68.

**XII. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING**

**A. Excess Emissions Reporting**

[A.A.C. R18-2-310.01.A and -310.01.B]

**1. Excess emissions shall be reported as follows:**

**a. The Permittee shall report to the Director any emissions in excess of the limits established by this permit. Such report shall be in two parts as specified below:**

**(1) Notification by telephone or facsimile within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information from Condition XII.A.1.b below.**

**(2) Detailed written notification by submission of an excess emissions report within 72 hours of the notification pursuant to Condition XII.A.1.a.(1) above.**

**b. The report shall contain the following information:**

**(1) Identity of each stack or other emission point where the excess emissions occurred;**

**(2) Magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;**

- (3) Date, time and duration, or expected duration, of the excess emissions;
  - (4) Identity of the equipment from which the excess emissions emanated;
  - (5) Nature and cause of such emissions;
  - (6) If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions; and
  - (7) Steps taken to limit the excess emissions. If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with the permit procedures.
2. In the case of continuous or recurring excess emissions, the notification requirements of this section shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in such notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period, or changes in the nature of the emissions as originally reported, shall require additional notification pursuant to Condition XII.A.1 above.

[A.A.C. R18-2-310.01.C]

**B. Permit Deviations Reporting**

[A.A.C. R18-2-306.A.5.b]

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the applicable requirement contains a definition of prompt or otherwise specifies a timeframe for reporting deviations, that definition or timeframe shall govern. Where the applicable requirement does not address the timeframe for reporting deviations, the Permittee shall submit reports of deviations according to the following schedule.

1. Notice that complies with A.A.C. R18-2-310.01.A is prompt for deviations that constitute excess emissions;
2. Notice regarding upset conditions, which are defined as malfunctions or breakdowns of pollution control equipment, continuous emissions monitoring systems (CEMS), or continuous opacity monitoring systems (COMS) that are submitted within two working days of discovery shall be considered prompt; and
3. Except as provided in Condition XII.B.1 and XII.B.2, prompt notification of all other types of deviations shall be every 6-months, concurrent with the semi-annual compliance certifications required in Condition VII, and can be submitted on the annual/semiannual deviation monitoring report form located on the Arizona Department of Environmental Quality Website.

[A.A.C. R18-2-306.A.5.b.i]

[A.A.C. R18-2-306.A.5.b.ii]

[A.A.C. R18-2-306.A.5.a]

**C. Emergency Provision**

1. An “emergency” means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if Condition XII.C.3 is met.
3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - a. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;
  - b. The permitted facility was being properly operated at the time;
  - c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
  - d. The Permittee submitted notice of the emergency to the Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.
4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

**D. Compliance Schedule**

[ARS § 49-426.I.5]

For any excess emission or permit deviation that cannot be corrected within 72 hours, the Permittee is required to submit a compliance schedule to the Director within 21 days of such occurrence. The compliance schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the permit terms or conditions that have been violated.

**E. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown**  
[A.A.C. R18-2-310]

1. **Applicability**

This rule establishes affirmative defenses for certain emissions in excess of an



emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

- a. Promulgated pursuant to Sections 111 or 112 of the Act;
- b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;
- c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;
- d. Contained in A.A.C. R18-2-715.F; or
- e. Included in a permit to meet the requirements of A.A.C. R18-2-406.A.5.

2. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. When emissions in excess of an applicable emission limitation are due to a malfunction, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

- a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the Permittee;
- b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
- c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee satisfactorily demonstrated that the measures were impracticable;
- d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
- e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
- f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
- g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;

- h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
- i. All emissions monitoring systems were kept in operation if at all practicable; and
- j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records

3. Affirmative Defense for Startup and Shutdown

- a. Except as provided in Condition XII.E.3.b below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. When emissions in excess of an applicable emission limitation are due to startup and shutdown, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:
  - (1) The excess emissions could not have been prevented through careful and prudent planning and design;
  - (2) If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
  - (3) The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
  - (4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
  - (5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
  - (6) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;
  - (7) All emissions monitoring systems were kept in operation if at all practicable; and
  - (8) Contemporaneous records documented the Permittee's actions in response to the excess emissions.
- b. If excess emissions occur due to a malfunction during routine startup and

shutdown, then those instances shall be treated as other malfunctions subject to Condition XII.E.2 above.

4. Affirmative Defense for Malfunctions during Scheduled Maintenance

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to Condition XII.E.2 above.

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Condition XII.E.2 or XII.E.3 above, the Permittee shall demonstrate, through submission of the data and information required by Condition XII.E and A.A.C. R18-2-310.01, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

### **XIII. RECORDKEEPING REQUIREMENTS**

[A.A.C. R18-2-306.A.4]

**A.** The Permittee shall keep records of all required monitoring information including, but not limited to, the following:

1. The date, place as defined in the permit, and time of sampling or measurements;
2. The date(s) analyses were performed;
3. The name of the company or entity that performed the analyses;
4. A description of the analytical techniques or methods used;
5. The results of such analyses; and
6. The operating conditions as existing at the time of sampling or measurement.

**B.** The Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings or other data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

**C.** All required records shall be maintained either in an unchangeable electronic format or in a handwritten logbook utilizing indelible ink.

### **XIV. REPORTING REQUIREMENTS**

[A.A.C. R18-2-306.A.5.a]

The Permittee shall submit the following reports:

**A.** Compliance certifications in accordance with Section VII of Attachment "A".

**B.** Excess emission; permit deviation, and emergency reports in accordance with Section XII of Attachment "A".

- C.** Other reports required by any condition of Attachment “B”.

## **XV. DUTY TO PROVIDE INFORMATION**

[A.A.C. R18-2-304.G and -306.A.8.e]

- A.** The Permittee shall furnish to the Director, within a reasonable time, any information that the Director may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.
- B.** If the Permittee has failed to submit any relevant facts or has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

## **XVI. PERMIT AMENDMENT OR REVISION**

[A.A.C. R18-2-318, -319, and -320]

The Permittee shall apply for a permit amendment or revision for changes to the facility which do not qualify for a facility change without revision under Section XVII, as follows:

- A.** Administrative Permit Amendment (A.A.C. R18-2-318);
- B.** Minor Permit Revision (A.A.C. R18-2-319); and
- C.** Significant Permit Revision (A.A.C. R18-2-320)

The applicability and requirements for such action are defined in the above referenced regulations.

## **XVII. FACILITY CHANGE WITHOUT A PERMIT REVISION**

[A.A.C. R18-2-317]

- A.** The Permittee may make changes at the permitted source without a permit revision if all of the following apply:
  - 1. The changes are not modifications under any provision of Title I of the Act or under ARS § 49-401.01(24);
  - 2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions;
  - 3. The changes do not violate any applicable requirements or trigger any additional applicable requirements;
  - 4. The changes satisfy all requirements for a minor permit revision under A.A.C. R18-2-319.A; and
  - 5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

- B.** The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if it meets all of the requirements of Conditions XVII.A and XVII.C of this Attachment.
- C.** For each change under Conditions XVII.A and XVII.B above, a written notice by certified mail or hand delivery shall be received by the Director and the Administrator a minimum of 7 working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change, but must be provided as far in advance of the change, as possible or, if advance notification is not practicable, as soon after the change as possible.
- D.** Each notification shall include:
1. When the proposed change will occur;
  2. A description of the change;
  3. Any change in emissions of regulated air pollutants; and
  4. Any permit term or condition that is no longer applicable as a result of the change.
- E.** The permit shield described in A.A.C. R18-2-325 shall not apply to any change made under this Section.
- F.** Except as otherwise provided for in the permit, making a change from one alternative operating scenario to another as provided under A.A.C. R18-2-306.A.11 shall not require any prior notice under this Section.
- G.** Notwithstanding any other part of this Section, the Director may require a permit to be revised for any change that, when considered together with any other changes submitted by the same source under this Section over the term of the permit, do not satisfy Condition XVII.A above.

## **XVIII. TESTING REQUIREMENTS**

[A.A.C. R18-2-312]

- A.** The Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the Director.
- B.** Operational Conditions during Testing
- Tests shall be conducted during operation at the maximum possible capacity of each unit under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Director, testing may be performed at a lower rate. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative operational conditions unless otherwise specified in the applicable standard.
- C.** Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual unless modified by the Director pursuant to A.A.C. R18-2-312.B.

**D. Test Plan**

At least 14 calendar days prior to performing a U.S. EPA Reference Method performance test, the Permittee shall submit a test plan to the Director in accordance with A.A.C. R18-2-312.B and the Arizona Testing Manual. This test plan must include the following:

1. Test duration;
2. Test location(s);
3. Test method(s); and
4. Source operation and other parameters that may affect test results.

**E. Stack Sampling Facilities**

The Permittee shall provide, or cause to be provided, performance testing facilities as follows:

1. Sampling ports adequate for test methods applicable to the facility;
2. Safe sampling platform(s);
3. Safe access to sampling platform(s); and
4. Utilities for sampling and testing equipment.

**F. Interpretation of Final Results**

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of the results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Director's approval, be determined using the arithmetic mean of the results of the other two runs. If the Director or the Director's designee is present, tests may only be stopped with the Director's or such designee's approval. If the Director or the Director's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation, which demonstrates good cause, must be submitted.

**G. Report of Final Test Results**

A written report of the results of all performance tests shall be submitted to the Director within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

**XIX. PROPERTY RIGHTS**

This permit does not convey any property rights of any sort, or any exclusive privilege.

**XX. SEVERABILITY CLAUSE**

[A.A.C. R18-2-306.A.7]

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force.

**XXI. PERMIT SHIELD**

[A.A.C. R18-2-325]

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements identified in the portions of this permit subtitled "Permit Shield". The permit shield shall not apply to minor revisions pursuant to Condition XVI.B of this Attachment and any facility changes without a permit revision pursuant to Section XVII of this Attachment.

**XXII. PROTECTION OF STRATOSPHERIC OZONE**

[40 CFR Part 82]

If this source becomes subject to the provisions of 40 CFR Part 82, then the Permittee shall comply with these provisions accordingly.

**XXIII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS**

[40 CFR Part 60, Part 63]

For all equipment subject to a New Source Performance Standard, or a National Emission Standard for Hazardous Air Pollutants, the Permittee shall comply with all applicable requirements contained in Subpart A of Title 40, Chapter 60 and Chapter 63 of the Code of Federal Regulations.

## ATTACHMENT “B”: SPECIFIC CONDITIONS

**Air Quality Control Permit No. 61325 (as revised by Significant Permit Revision No. 70818)  
For  
El Paso Natural Gas Company, L.L.C. – Willcox Compressor Station**

### **I. FACILITY WIDE REQUIREMENTS**

#### **A. Operational and Fuel Limitations**

1. The Permittee shall have on site or on call a person certified in EPA Reference Method 9 unless all Method 9 observations or instantaneous visual observations required by this permit are conducted as Alternative Method-082 (Digital Camera Operating Technique). The Permittee shall certify the camera and the associated software in accordance with ALT-082 procedures. Any Method 9 test or instantaneous visual survey required by this permit can be conducted as ALT-082. The results of a Method 9 observation or any individual instantaneous visual observation conducted as ALT-082 shall be obtained within 30 minutes of completing the Method 9 observation or individual instantaneous visual observation.

[A.A.C. R18-2-306.A.3.c]

2. The Permittee shall operate and maintain all equipment identified in Attachment “C” in good working order.

[A.A.C. R18-2-306.A.2]

3. All equipment listed in Attachment “C” shall be operated and maintained in accordance with vendor-supplied operations and maintenance instructions. If vendor-supplied operations and maintenance instructions are not available or not applicable, the Permittee shall prepare an Operations and Maintenance plan, which shall contain adequate information to properly operate and maintain the equipment.

[A.A.C. R18-2-306.A.2]

4. Fuel Limitation

*The Permittee shall combust only natural gas in the equipment listed in Attachment “C”.*

[A.A.C. R18-2-306.A.2 and A.A.C. R18-2-306.01]

[Material permit conditions are identified by underlines and italics]

#### **B. Monitoring and Recordkeeping Requirements**

1. The Permittee shall submit reports of all recordkeeping and monitoring required within this Attachment “B” along with the compliance certifications required by Section VII of Attachment “A”.

[A.A.C. R18-2-306.A.5]

2. The Permittee shall maintain, on site, records of the manufacturer's specifications or the Operation and Maintenance Plan for minimizing emissions for all equipment listed in Attachment “C”.

[A.A.C. R18-2-306.A.4]

3. The Permittee shall maintain records of the gas quality characteristics in a current,



valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains per 100 standard cubic feet (scf) or less.

[A.A.C. R18-2-306.A.3.c and A.A.C. R18-2- 306.A.4.a]

## **II. GAS TURBINE ENGINES**

### **A. Applicability**

This Section applies to each Gas Turbine identified in Attachment “C”.

### **B. Particulate Matter**

#### **1. Emission Limitation**

- a. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from the gas turbine engine in excess of the amounts calculated by the following equation:

$$E = 1.02Q^{0.769}$$

Where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour;

Q = the heat input in million Btu per hour.

[A.A.C. R18-2-719.C.1]

- b. For the purposes of Condition II.B.1.a, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. Compliance tests shall be conducted during operation at the normal rated capacity of each unit. The total heat input of all the stationary rotating machinery on a plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

[A.A.C. R18-2-719.B]

#### **2. Monitoring and Recordkeeping Requirements**

The Permittee shall keep records of a current, valid purchase contract, tariff sheet or transportation contract. The records shall contain information regarding the lower heating value of the fuel.

[A.A.C. R18-2-306.A.3.c and 306.A.4.a]

#### **3. Permit Shield**

Compliance with the conditions of this Part shall be deemed compliance with A.A.C.R18-2-719.B, -719.C.1 and -719.I.

[A.A.C. R18-2-325]

### **C. Opacity**

#### **1. Emission Limitations**

The Permittee shall not cause, allow or permit to be emitted into the atmosphere from the stationary rotating machinery smoke for any period of time greater than ten consecutive seconds which exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes.

[A.A.C. R18-2-719.E]

2. Monitoring, Recordkeeping and Reporting Requirements

[A.A.C. R18-2-306.A.3.c, .306.A.4.a and 306.A.5]

- a. A certified EPA Reference Method 9 observer shall conduct a quarterly survey of visible emissions emanating from the stacks of the stationary rotating machinery when in operation. If the machinery is not in operation at the time of the survey, the Permittee does not have to set it into operation to conduct the survey. Instead the Permittee shall document that the machinery was not in operation. The Permittee shall keep records of the initial survey and any EPA Reference Method 9 observations performed. These records shall include the emission point observed, location of observer, name of observer, date and time of observation/survey, and the results of the observation/survey.
- b. If the opacity of the emissions observed during the initial survey appears to exceed the applicable standard, the observer shall conduct a certified EPA Reference Method 9 observation. If the observation shows a Method 9 opacity reading in excess of the standard, the Permittee shall report this to ADEQ as excess emission and initiate appropriate corrective action to reduce the opacity to a level below the standard. The Permittee shall keep a record of the corrective action performed

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-719.E.

[A.A.C. R18-2-325]

**D.** Nitrogen Oxides

1. Emission Limit

The Permittee shall not emit NO<sub>x</sub> from each of the compressor engine stacks in excess of 68 pounds per hour (lb/hr).

[A.A.C. R18-2-406.A.5]

2. Testing Requirements

[A.A.C. R18-2-306.A.3.c and -312]

- a. A performance test for NO<sub>x</sub> shall be conducted on each gas turbine engine once per calendar year.
- b. The Permittee shall use EPA Reference Method 20 to determine NO<sub>x</sub> emissions
- c. The Permittee may submit an alternate and equivalent test method that is

listed in 40 CFR Part 60, Appendix A to the Director in any test plan for approval by the Director.

### **III. EMERGENCY GENERATOR SUBJECT TO 40 CFR 63 SUBPART ZZZZ**

#### **A. Applicability**

This Section applies to the Emergency Generator identified in Attachment “C” as subject to 40 CFR 63 Subpart ZZZZ.

[A.A.C. R18-2-306.A.3.c and 306.A.4.a]

#### **B. Particulate Matter**

##### **1. Emission Limitation**

- a. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from the stationary rotating machinery in excess of the amounts calculated by the following equation:

$$E = 1.02Q^{0.769}$$

Where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour;

Q = the heat input in million Btu per hour.

[A.A.C. R18-2-719.C.1]

- b. For the purposes of Condition III.B.1.a, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. Compliance tests shall be conducted during operation at the normal rated capacity of each unit. The total heat input of all the stationary rotating machinery on a plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

[A.A.C. R18-2-719.B]

##### **2. Monitoring and Recordkeeping Requirements**

[A.A.C. R18-2-306.A.3.c and 306.A.4.a]

The Permittee shall keep records of a current, valid purchase contract, tariff sheet or transportation contract. The records shall contain information regarding the lower heating value of the fuel.

##### **3. Permit Shield**

[A.A.C. R18-2-325]

Compliance with the conditions of this Part shall be deemed compliance with A.A.C.R18-2-719.B and -719.C.1.

#### **C. Opacity**

##### **1. Emission Limitations**

The Permittee shall not cause, allow or permit to be emitted into the atmosphere from the stationary rotating machinery smoke for any period of time greater than ten consecutive seconds which exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes.

2. Monitoring, Recordkeeping and Reporting Requirements

[A.A.C. R18-2-306.A.3.c, .306.A.4.a and 306.A.5]

- a. A certified EPA Reference Method 9 observer shall conduct a quarterly survey of visible emissions emanating from the stacks of the stationary rotating machinery when in operation. If the machinery is not in operation at the time of the survey, the Permittee does not have to set it into operation to conduct the survey. Instead the Permittee shall document that the machinery was not in operation. The Permittee shall keep records of the initial survey and any EPA Reference Method 9 observations performed. These records shall include the emission point observed, location of observer, name of observer, date and time of observation/survey, and the results of the observation/survey.
- b. If the opacity of the emissions observed during the initial survey appears to exceed the applicable standard, the observer shall conduct a certified EPA Reference Method 9 observation. If the observation shows a Method 9 opacity reading in excess of the standard, the Permittee shall report this to ADEQ as excess emission and initiate appropriate corrective action to reduce the opacity to a level below the standard. The Permittee shall keep a record of the corrective action performed.

3. Permit Shield

[A.A.C. R18-2-325]

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-719.E.

**D. Hazardous Air Pollutants**

1. Applicability

The requirements of 40 CFR 63, Subpart ZZZZ are applicable to the emergency generator identified in Attachment "C".

[40 CFR 63.6580 and 40 CFR 63.6590]

2. Operating Requirements

- a. The Permittee shall comply with the following operation and maintenance requirements:

[40 CFR 63.6603(a), and 40 CFR 63, Subpart ZZZZ, Table 2d]

- (1) The Permittee shall change the oil and filter every 500 hours of operation or annually, whichever comes first. If the Permittee prefers to extend the oil change requirement, an oil analysis program described below shall be completed. The oil analysis

must be performed at the same frequency specified for changing the oil.

[40 CFR 63.6625(j), and 40 CFR Table 2d of Subpart ZZZZ]

(a) The Permittee shall at a minimum analyze the following three parameters: Total Acid Number, viscosity and water content. The condemning limits for these parameters are as follows:

- (i) Total Acid Number: increased by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of oil when new;
- (ii) Viscosity: changed more than 20 percent from the viscosity of oil when new;
- (iii) Water Content: greater than 0.5 percent by volume.

(b) If all of the above limits are not exceeded, the Permittee is not required to change the oil. If any of the above limits are exceeded, the Permittee shall change the oil within 2 business days of receiving the results of the analysis or before commencing operation, whichever is later. Records must be kept of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the operation of the engine.

(2) The Permittee shall inspect the spark plugs every 1000 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63, Subpart ZZZZ, Table 2d]

(3) The Permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63, Subpart ZZZZ, Table 2d]

b. If the emergency SI generator is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Conditions III.D.2.a(1) through (3), or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice shall be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated.

[40 CFR 63 Subpart ZZZZ, Table 2d]

c. At all times, The Permittee shall operate and maintain the emergency SI generator, including associated air pollution control equipment and monitoring equipment, in a manner consistent with good air pollution

control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels as required by 40 CFR Part 63, Subpart ZZZZ have been achieved.

[40 CFR 63.6605(b)]

- d. The Permittee shall operate and maintain the emergency SI generator and any after-treatment control device according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e) and 40 CFR 63 Subpart ZZZZ, Table 6, Item 9]

- e. *The Permittee shall install a non-resettable hour meter if one is not already installed.*

[40 CFR 63.6625(f) and A.A.C. R18-2-331.A.3.c]

[Material Permit Conditions are indicated by underline and italics]

- f. The Permittee shall operate the emergency engines according to the requirements in Conditions III.D.2.f.(1) through (3) below. In order for the engines to be considered emergency stationary ICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance response, and operation in non-emergency situations for 50 hours per year, as described in these Conditions, is prohibited. If the emergency engine is not operated in accordance with the requirements in Conditions III.D.2.f.(1) through (3) below, the engine will not be considered an emergency engine and must meet all requirements for non-emergency engines.

[40 CFR 63.6640(f)]

- (1) There is no time limit on the use of the emergency SI generator in emergency situations.

[40 CFR 63.6640(f)(1)]

- (2) The Permittee may operate the emergency SI generator for any combination of the purposes specified in Conditions III.D.2.f.(2)(a) through (c) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by Condition III.D.2.f.(3) counts as part of the 100 hours per calendar year allowed by this Condition.

[40 CFR 63.6640(f)(2)]

- (a) The engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission operator, or the insurance company associated with the engine. The Permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the engine beyond the 100

hours per year.

[40 CFR 63.6640(f)(2)(i)]

- (b) The engine may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see 40 CFR 60.17), or other authorized entity as determined by the Reliability Coordinator has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

[40 CFR 63.6640(f)(2)(ii)]

- (c) The engine may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

[40 CFR 63.6640(f)(2)(iii)]

- (3) The Permittee may operate the emergency SI generator for a maximum of 50 hours in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in Condition III.D.2(f)(2). The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the Permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40 CFR 63.6640(f)(4)]

### 3. Recordkeeping and Reporting Requirements

#### a. The Permittee shall keep records of the following

- (1) The Permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the Permittee operated and maintained the stationary RICE according to the maintenance plan and management practice requirements under Condition III.D.2.a.

[40 CFR 63.6655(e)]

- (2) The Permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in Conditions III.D.2.f(2)(b) or (2)(c) the Permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

[40 CFR 63.6655(f)]

b. Reporting Requirements

- (1) The Permittee shall report any failure to perform the work practice requirements of Condition III.D.2.a per the required schedule. If the failure to perform the work practice requirement is due to an unacceptable risk under federal, state, or local law, the Permittee shall identify in the report the federal, state, or local law under which the risk was deemed unacceptable.

[Table 2d 40 CFR 63 Subpart ZZZZ]

- (2) If the engine operates for more than 15 hours per calendar year for the purposes specified in Condition III.D.2.f.(2)(b) and (c), the Permittee shall submit an annual report according to the requirements in Conditions III.D.3.b.(2)(a) through (c) below.

[40 CFR 63.6650(h)]

- (a) The report shall contain the following information:

- (i) Company name and address where the engine is located.
- (ii) Date of the report and beginning and ending dates of the reporting period.
- (iii) Engine site rating and model year.
- (iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
- (v) Hours operated for the purposes specified in Condition III.D.2.f.(2)(b) and (c), including the date, start time, and end time for engine operation for the purposes specified in Condition III.D.2.f.(2)(b) and (c).

- (b) The first annual report shall cover the calendar year 2015 and shall be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year shall be submitted no later than March 31 of the following calendar year.

- (c) The annual report shall be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report shall be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13.

- (3) The Permittee shall submit compliance certifications and all deviations pursuant to timelines specified in Condition VII.A and



Condition XII.B of Attachment A, respectively.

[A.A.C. R18-2-309.2.a, -c, -d, and A.A.C. R18-2-306.A.5.b]

4. Permit Shield

Compliance with this Part shall be deemed compliance with 40 CFR 63.6580, 63.6590, 63.6603(a), 63.6605(b), 63.6625(e), 63.6625(f), 63.6625(j), 63.6640(f)(1), (2) and (4), 63.6650(h), 63.6655(e) and 63.6655(f).

[A.A.C. R18-2-325]

#### IV. FUGITIVE DUST REQUIREMENTS

**A.** Applicability

This Section applies to any source of fugitive dust in the facility.

**B.** Particulate Matter and Opacity

Open Areas, Roadways & Streets, Storage Piles, and Material Handling

1. Emission Limitations/Standards

- a. Opacity of emissions from any fugitive dust non-point source shall not be greater than 40% measured in accordance with the Arizona Testing Manual, Reference Method 9.

[A.A.C. R18-2-614]

- b. The Permittee shall not cause, allow or permit visible emissions from any fugitive dust point source, in excess of 20% opacity.

[A.A.C. R18-2-702.B]

- c. The Permittee shall employ the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne:

- (1) Keep dust and other types of air contaminants to a minimum in an open area where construction operations, repair operations, demolition activities, clearing operations, leveling operations, or any earth moving or excavating activities are taking place, by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means;

[A.A.C. R18-2-604.A]

- (2) Keep dust to a minimum from driveways, parking areas, and vacant lots where motor vehicular activity occurs by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means;

[A.A.C. R18-2-604.B]

- (3) Keep dust and other particulates to a minimum by employing dust suppressants, temporary paving, detouring, wetting down or by other reasonable means when a roadway is repaired, constructed,

or reconstructed;

[A.A.C. R18-2-605.A]

- (4) Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust;

[A.A.C. R18-2-605.B]

- (5) Take reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods when crushing, handling, or conveying material likely to give rise to airborne dust;

[A.A.C. R18-2-606]

- (6) Take reasonable precautions such as chemical stabilization, wetting, or covering when organic or inorganic dust producing material is being stacked, piled, or otherwise stored;

[A.A.C. R18-2-607.A]

- (7) Operate stacking and reclaiming machinery utilized at storage piles at all times with a minimum fall of material, or with the use of spray bars and wetting agents;

[A.A.C. R18-2-607.B]

- (8) Any other method as proposed by the Permittee and approved by the Director.

[A.A.C. R18-2-306.A.3.c]

## 2. Monitoring and Recordkeeping Requirements

- a. The Permittee shall maintain records of the dates on which any of the activities listed in Conditions IV.B.1.c(1) through IV.B.1.c(8) above were performed and the control measures that were adopted.

[A.A.C. R18-2-306.A.3.c]

### b. Opacity Monitoring Requirements

- (1) A certified Method 9 observer shall conduct a quarterly visual survey of visible emissions from the fugitive dust sources. The Permittee shall keep a record of the name of the observer, the date and location on which the observation was made, and the results of the observation.

- (2) If the observer sees a visible emission from a fugitive dust source that on an instantaneous basis appears to exceed applicable opacity standard, then the observer shall, if practicable, take a six-minute Method 9 observation of the visible emission.

- (a) If the six-minute opacity of the visible emission is less than or equal to applicable opacity standard, the observer shall make a record of the following:

- (i) Location, date, and time of the observation; and

(ii) The results of the Method 9 observation.

(b) If the six-minute opacity of the visible emission exceeds applicable opacity standard, then the Permittee shall do the following:

(i) Adjust or repair the controls or equipment to reduce opacity to below the applicable standard; and

(ii) Report it as an excess emission under Section XII.A of Attachment "A".

[A.A.C. R18-2-306.A.3.c]

### 3. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-604.A, A.A.C. R18-2-604.B, A.A.C. R18-2-605, A.A.C. R18-2-606 and A.A.C. R18-2-607.

## V. MOBILE SOURCE REQUIREMENTS

### A. Applicability

The requirements of this Section are applicable to mobile sources which either move while emitting air contaminants or are frequently moved during the course of their utilization but are not classified as motor vehicles, agricultural vehicles, or agricultural equipment used in normal farm operations. Mobile sources shall not include portable sources as defined in A.A.C. R18-2-101.108.

[A.A.C. R18-2-801.A]

### B. Particulate Matter and Opacity

#### 1. Emission Limitations/Standards

##### a. Off-Road Machinery

The Permittee shall not cause, allow, or permit to be emitted into the atmosphere from any off-road machinery, smoke for any period greater than ten consecutive seconds, the opacity of which exceeds 40%. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes. Off-road machinery shall include trucks, graders, scrapers, rollers, and other construction and mining machinery not normally driven on a completed public roadway.

[A.A.C. R18-2-802.A and -802.B]

##### b. Roadway and Site Cleaning Machinery

(1) The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any roadway and site cleaning machinery smoke or dust for any period greater than ten consecutive seconds, the opacity of which exceeds 40%. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes.

[A.A.C. R18-2-804.A]

- (2) The Permittee shall take reasonable precautions, such as the use of dust suppressants, before the cleaning of a site, roadway, or alley. Earth or other material shall be removed from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water or by other means.

[A.A.C. R18-2-804.B]

- c. Unless otherwise specified, no mobile source shall emit smoke or dust the opacity of which exceeds 40%.

[A.A.C. R18-2-801.B]

## 2. Recordkeeping Requirement

The Permittee shall keep a record of all emissions related maintenance activities performed on the Permittee's mobile sources stationed at the facility as per manufacturer's specifications.

[A.A.C. R18-2-306.A.5.a]

## 3. Permit Shield

Compliance with this Section shall be deemed compliance with A.A.C. R18-2-801, A.A.C. R18-2-802.A and A.A.C. R18-2-804..

[A.A.C. R18-2-325]

# VI. OTHER PERIODIC ACTIVITIES

## A. Abrasive Blasting

### 1. Particulate Matter and Opacity

#### a. Emission Limitations/Standards

The Permittee shall not cause or allow sandblasting or other abrasive blasting without minimizing dust emissions to the atmosphere through the use of good modern practices. Good modern practices include:

- (1) wet blasting;
- (2) effective enclosures with necessary dust collecting equipment; or
- (3) any other method approved by the Director.

[A.A.C. R18-2-726]

#### b. Opacity

The Permittee shall not cause, allow or permit visible emissions from sandblasting or other abrasive blasting operations in excess of 20% opacity, as measured by EPA Reference Method 9.

[A.A.C. R18-2-702.B]

## 2. Monitoring and Recordkeeping Requirement

Each time an abrasive blasting project is conducted, the Permittee shall make a record of the following:

- a. The date the project was conducted;
- b. The duration of the project; and
- c. Type of control measures employed.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with this Part shall be deemed compliance with A.A.C. R18-2-726 and A.A.C. R18-2-702.B.

[A.A.C.R18-2-325]

**B.** Use of Paints

1. Volatile Organic Compounds

a. Emission Limitations/Standards

While performing spray painting operations, the Permittee shall comply with the following requirements:

- (1) The Permittee shall not conduct or cause to be conducted any spray painting operation without minimizing organic solvent emissions. Such operations, other than architectural coating and spot painting, shall be conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray.  
[A.A.C.R18-2-727.A]

- (2) The Permittee or their designated contractor shall not either:

- (a) Employ, apply, evaporate, or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or
- (b) Thin or dilute any architectural coating with a photochemically reactive solvent.  
[A.A.C.R18-2-727.B]

- (3) For the purposes of Condition VI.B.1.a(2), a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in Conditions VI.B.1.a(3)(a) through VI.B.1.a(3)(c) below, or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

- (a) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5 percent.

- (b) A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: 8 percent.
- (c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.

[A.A.C.R18-2-727.C]

- (4) Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in Conditions VI.B.1.a(3)(a) through VI.B.1.a(3)(c) above, it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.

[A.A.C.R18-2-727.D]

b. Monitoring and Recordkeeping Requirements

- (1) Each time a spray painting project is conducted, the Permittee shall make a record of the following:

- (a) The date the project was conducted;
- (b) The duration of the project;
- (c) Type of control measures employed;
- (d) Material Safety Data Sheets for all paints and solvents used in the project; and
- (e) The amount of paint consumed during the project.

- (2) Architectural coating and spot painting projects shall be exempt from the recordkeeping requirements of Condition VI.B.1.b(1) above.

[A.A.C. R18-2-306.A.3.c]

c. Permit Shield

Compliance with this Part shall be deemed compliance with A.A.C.R18-2-727.

[A.A.C.R18-2-325]

2. Opacity

a. Emission Limitation/Standard

The Permittee shall not cause, allow or permit visible emissions from painting operations in excess of 20% opacity, as measured by EPA Reference Method 9.

[A.A.C. R18-2-702.B]

b. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C.R18-2-702.B.

[A.A.C. R18-2-325]

**C. Demolition/Renovation - Hazardous Air Pollutants**

**1. Emission Limitation/Standard**

The Permittee shall comply with all applicable requirements of 40 CFR 61 Subpart M (National Emissions Standards for Hazardous Air Pollutants - Asbestos).

[A.A.C. R18-2-1101.A.8]

Monitoring and Recordkeeping Requirement

The Permittee shall keep all required records in a file. The required records shall include the “NESHAP Notification for Renovation and Demolition Activities” form and all supporting documents.

[A.A.C. R18-2-306.A.3.c]

**2. Permit Shield**

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-1101.A.8.

[A.A.C. R18-2-325]

**VII. GAS TURBINE SUBJECT TO NEW SOURCE PERFORMANCE STANDARDS (NSPS)**

**A. Applicability**

This Section is applicable to the Solar Mars 90-13000S Combustion Turbine.

**B. General Requirements**

The Permittee shall operate and maintain the stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

[40 CFR 60.4333(a)]

**C. Nitrogen Oxides**

**1. Emission Standards**

- a. The Permittee shall not allow or cause NO<sub>x</sub> emissions in excess of 25 ppm at 15 percent O<sub>2</sub> or 150 ng/J of useful output (1.2 lb/MWh).

[40 CFR 60.4320]

- b. The Permittee shall not allow or cause NO<sub>x</sub> emissions in excess of 15 ppmvd at 15 percent O<sub>2</sub> (0.61 pound/MWh).

[A.A.C. R18-2-306..01.A and 331.A.3.a]

[Material Permit condition indicated by underline and italics]

**2. Monitoring Requirements**

The Permittee shall calibrate, operate and maintain a portable NO<sub>x</sub> analyzer for periodic stack testing in accordance with ASTM D6522, incorporated by reference

3. Compliance Requirements

- a. The Permittee shall demonstrate initial compliance with the emission limits in Conditions VII.C.1.a and b by conducting a performance test within 180 days of start-up of the turbine in accordance with Conditions VII.C.5.a through c. The Permittee shall conduct subsequent annual performance tests in accordance with Conditions VII.C.5.a through c (no more than 14 calendar months following the previous performance test).

[40 CFR 60.4340(a), A.A.C. R18-2-306.A.3.a]

- b. The Permittee shall demonstrate ongoing compliance with the emission standard in Conditions VII.C.1.a and b by performing periodic stack test during any monitoring period using the portable analyzer in Condition VII.C.2. Except as provided in Condition VII.C.3.f, the Permittee is not required to conduct simultaneous EPA Reference Method and portable analyzer stack tests.

[A.A.C. R18-2-312]

- c. The Permittee shall conduct periodic stack tests using the portable analyzer in accordance with Condition VII.C.3.b every calendar quarter when the turbine operates more than 500 hours in that quarter. If the unit is down, when the monitoring is scheduled and it has operated more than 500 hours in that quarter, the Permittee does not need to start up the turbine solely to conduct the periodic stack test with the portable analyzer. The Permittee shall, however, conduct the delayed periodic stack testing with the portable analyzer within one week of resuming operation.

[A.A.C. R18-2-312]

- d. If the NO<sub>x</sub> emission results from four consecutive periodic stack tests using the portable analyzer under VII.C.3.c successfully demonstrate compliance with the emission limits in Condition VII.C.1.a and b, subsequent periodic stack testing with the portable analyzer may be reduced to semi-annual. The Permittee shall conduct a periodic stack test using the portable analyzer when the turbine operates more than 1000 hours in that semi-annual period. If the unit is down, when the test with the portable analyzer is scheduled and it has operated more than 1000 hours in that semi-annual period, the Permittee does not need to start up the turbine solely to conduct the periodic stack test with the portable analyzer. The Permittee shall, however, conduct the delayed periodic stack testing with the portable analyzer within one week of resuming operation.

[A.A.C. R18-2-312]

- e. If the NO<sub>x</sub> emission result from any periodic stack test with the portable analyzer or a performance test conducted in accordance with Condition VII.C.3.a through d exceeds the emission limit in Condition VII.C.1.a or b, the Permittee shall shut down the unit for investigation and/or repairs, and on resumption of operations, revert to periodic stack testing with the portable analyzer in Condition VII.C.3.c. Within 60 days of resumption of operation, the Permittee shall conduct a performance test in accordance with Condition VII.C.3.a.



- f. At the time of the initial and the first subsequent performance test conducted in accordance with Condition VII.C.5.a, the Permittee shall also conduct stack test using the portable analyzer in accordance with Condition VII.C.2.

[A.A.C. R18-2-306.A.3.c]

4. Recordkeeping and Reporting Requirements

[A.A.C. R18-2-306.A.4]

- a. The Permittee shall maintain records of
  - (1) The results of all annual performance tests,
  - (2) The results of all periodic monitoring by the portable analyzer, and
  - (3) All calibration checks for the portable analyzer.
- b. The above records shall be available to ADEQ upon request.
- c. The Permittee shall submit a written report of the results of each performance test performed in accordance with Condition VII.C.5.a before the close of business on the 60th day following the completion of the performance test.
- d. At the time of semi-annual compliance certification, the Permittee shall submit a written report of the results of all periodic stack tests conducted using the portable analyzer during the corresponding period.

[40 CFR 60.4375(b)]

[A.A.C. R18-2-306.A.5]

5. Performance Test Requirements

- a. The Permittee shall conduct the initial and subsequent annual performance tests required in Condition VII.C.3.a in accordance with procedures in 40 CFR 60.4400(a).
- b. The performance test in Condition VII.C.5.a shall be done at any load condition within plus or minus 25 percent of 100 percent of peak load. The Permittee may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. The Permittee shall conduct three separate test runs for each performance test. The minimum time per run is 20 minutes.
- c. Compliance with the emission limit in Conditions VII.C.1.a and b shall be demonstrated at each tested load level. Compliance is achieved if the three-run arithmetic average NO<sub>x</sub> emission rate at each tested level meets the emission limit in Conditions VII.C.1.a and b.
- d. The Permittee shall conduct periodic stack testing using the portable

[40 CFR 60.4400(a)]

[40 CFR 60.4400(b)]

[40 CFR 60.4400(b)(4)]

analyzer in Condition VII.C.2 to demonstrate continuous compliance with the NOx emission limit in Conditions VII.C.1.a and b. Before the first periodic stack testing event with the portable analyzer, the Permittee shall submit to the Department the testing protocol for approval.

[A.A.C. R18-2-311.D, and 312.B]

6. Permit Shield

Compliance with the conditions of this Subsection shall be deemed compliance with 40 CFR 60.4320, 60.4333(a), 60.4340(a), 60.4400(a), 60.4400(b), and 60.4400(b)(4).

[A.A.C. R18-2-325]

**D. Sulfur Dioxide**

1. Emission Standard

The Permittee shall not burn in the turbine any fuel which contains total potential sulfur emissions in excess of 26 ng SO<sub>2</sub>/J (0.060 lb SO<sub>2</sub>/MMBtu) heat input.

[40 CFR 60.4330(a)(2)]

2. Compliance Requirement

To demonstrate compliance with Condition VII.D.1, the Permittee shall maintain a valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for natural gas is 20 grains of sulfur or less per 100 standard cubic feet, and has potential sulfur emissions of less than less than 26 ng SO<sub>2</sub>/J (0.060 lb SO<sub>2</sub>/MMBtu) heat input.

[40 CFR 60.4365(a)]

3. Permit Shield

Compliance with the conditions of this Subsection shall be deemed compliance with 40 CFR 60.4330(a)(2) and 60.4365(a).

[A.A.C. R18-2-325]

**VIII. EMERGENCY STATIONARY SPARK IGNITION INTERNAL COMBUSTION ENGINES (SI ICE)**

**A. Applicability**

This Section applies to the emergency SI ICE identified in the equipment list as subject to this Section.

**B. Operating Requirements**

1. The Permittee shall operate the emergency engine according to the requirements in Conditions VIII.B.1.a through c.

a. In emergency situations, there is no time limit on the use of the emergency SI ICE.

[40 CFR 60.4243(d)(1)]

b. The Permittee may operate an engine for maintenance checks and

readiness testing for a maximum of 100 hours per year provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. The Permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year.

[40 CFR 60.4243(d)(2)]

- c. The Permittee may operate the emergency stationary SI ICE up to 50 hours per year in non-emergency situations. These hours shall be counted towards the 100 hours per year provided for maintenance and testing.

[40 CFR 60.4243(d)(3)]

2. The Permittee shall operate and maintain the SI ICE that achieves the emission standards as required in Condition VIII.C over the entire life of the engine.

[40 CFR 60.4234]

#### **C. Emission Limitations and Standards**

The emergency SI ICE shall comply with the following emission standards:

[40 CFR 60.4233(e)]

1. NOX: 2.0 g/HP-hr or 160 ppmvd @15% O<sub>2</sub>
2. CO: 4.0 g/HP-hr or 540 ppmvd @15% O<sub>2</sub>
3. VOC: 1.0 g/HP-hr or 86 ppmvd @15% O<sub>2</sub>

#### **D. Monitoring Requirements**

If the emergency stationary SI ICE does not meet the standards applicable to non-emergency engine, the Permittee shall install a non-resettable hour meter.

[40 CFR 60.4237(a), R18-2-331.A.3.a]

[Material Permit Conditions are indicated by underline and italics]

#### **E. Compliance Requirements**

1. The Permittee operating a stationary SI ICE shall demonstrate compliance by purchasing engines certified to the emission standards in Condition VIII.C. The Permittee shall

[40 CFR 60.4243(a)(1) and (b)]

- a. Operate and maintain the certified stationary SI ICE and control device according to the manufacturer's emission-related written instructions;
- b. Keep records of conducted maintenance; and
- c. Meet the requirements specified in 40 CFR Part 1068, Subparts A through D.
- d. If the Permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the engine will not be considered out of

compliance.

2. If Permittee does not operate and maintain the certified stationary SI ICE and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine, and the Permittee shall demonstrate compliance by

[40 CFR 60.4243(a)(2)]

- a. The Permittee shall keep a maintenance plan and records of conducted maintenance and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- b. In addition, the Permittee shall conduct an initial performance test within 1 year of engine startup and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance in accordance with 40 CFR 60.4244.

#### **F. Recordkeeping and Reporting Requirements**

1. The Permittee operating a stationary SI ICE shall meet the following recordkeeping requirements:

[40 CFR 60.4245(a)]

- a. Records of all notifications submitted to comply with 40 CFR §60.4245 and all documentation supporting any notification;
- b. Maintenance conducted on the engine;
- c. If the stationary SI ICE is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable; and
- d. If the stationary SI ICE is not a certified engine or is a certified engine operating in a non-certified manner and subject to the requirements in Condition VIII.E.2, documentation that the engine meets the emission standards.

2. For the emergency SI ICE that do not meet the standards applicable to non-emergency engines, the Permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

[40 CFR 60.4245(b)]

3. If any SI ICE is subject to performance testing requirement in Condition VIII.E.2, the Permittee shall submit a copy of each performance test as conducted in accordance with 40 CR CFR 60.4244 within 60 days after the test has been completed in accordance with 40 CFR 60.4245(d) .

[40 CFR 60.4245(d)]

#### **G. Permit Shield**

Compliance with the conditions of this Section shall be deemed compliance with 40 CFR 60.4233(e), 60.4237(a), 60.4243(a)(1), (a)(2), (b), (d), 60.4245(a), (b), (c) and (d).

[A.A.C. R18-2-325]

## **IX. GHG AND VOC FUGITIVE EMISSIONS REQUIREMENTS**

### **A. Applicability**

1. The requirements under this Section are applicable to the Willcox Compressor Station upon installation of the new compressor at the Compressor Station.

[40 CFR 60.5365a(j)]

2. These requirements shall become effective from the date of the startup of the new Solar/Mars 13000 S compressor.

[40 CFR 60.5370a(a)]

### **B. General**

At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided for in 40 CFR 60.8(c) do not apply to this Section.

[40 CFR 60.5370a(b)]

### **C. Definitions**

1. *Fugitive emissions component* means any component that has the potential to emit fugitive emissions of methane or VOC at a compressor station, including but not limited to valves, connectors, pressure relief devices, open-ended lines, flanges, covers and closed vent systems, compressors, instruments, and meters. Devices that vent as part of normal operations, such as natural gas-driven pneumatic controllers or natural gas-driven pumps, are not fugitive emissions components, insofar as the natural gas discharged from the device's vent is not considered a fugitive emission. Emissions originating from other than the vent, such as the thief hatch on a controlled storage vessel, would be considered fugitive emissions.

[40 CFR 60.5430a]

2. For purposes of this Section IX, fugitive emissions are defined as: Any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 ppm or greater using Method 21.

[40 CFR 60.5397a(a)]

### **D. Monitoring Requirements**

1. The Permittee shall develop an emissions monitoring plan that covers the collection of fugitive emissions components at compressor stations within each company-defined area in accordance with Conditions IX.D.2 and 3.

[40 CFR 60.5397a(b)]

2. At the minimum, the fugitive emissions monitoring plans shall include the following elements:

[40 CFR 60.5397a(c)]

- a. The frequency for conducting surveys. Surveys shall be conducted at least as frequently as required by Conditions IX.D.5 and 6.
- b. The technique for determining fugitive emissions (*i.e.*, Method 21 at 40 CFR part 60, appendix A-7, or optical gas imaging).
- c. The manufacturer and model number of fugitive emissions detection equipment to be used.
- d. The procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, including timeframes for fugitive emission components that are unsafe to repair. The Permittee's repair schedule shall meet the requirements of Condition IX.D.7 at a minimum.
- e. The procedures and timeframes for verifying fugitive emission component repairs.
- f. Records that will be kept and the length of time records will be kept.
- g. If the Permittee is using optical gas imaging, the plan shall also include the elements specified below:
  - (1) Verification that the optical gas imaging equipment meets the specifications of Conditions IX.D.2.g(1)(a) and (b) below. This verification is an initial verification and may either be performed by the facility, by the manufacturer, or by a third party. For the purposes of complying with the fugitives emissions monitoring program with optical gas imaging, a fugitive emission is defined as any visible emissions observed using optical gas imaging.
    - (a) The optical gas imaging equipment shall be capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions.
    - (b) The optical gas imaging equipment shall be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of  $\leq 60$ g/hr from a quarter inch diameter orifice.
  - (2) Procedure for a daily verification check.
  - (3) Procedure for determining the operator's maximum viewing distance from the equipment and how the operator will ensure that this distance is maintained.
  - (4) Procedure for determining maximum wind speed during which monitoring can be performed and how the operator will ensure

monitoring occurs only at wind speeds below this threshold.

- (5) Procedures for conducting surveys, including the items specified below:
    - (a) How the operator will ensure an adequate thermal background is present in order to view potential fugitive emissions.
    - (b) How the operator will deal with adverse monitoring conditions, such as wind.
    - (c) How the operator will deal with interferences (e.g., steam).
  - (6) Training and experience needed prior to performing surveys.
  - (7) Procedures for calibration and maintenance. At a minimum, procedures shall comply with those recommended by the manufacturer.
- h. If the Permittee is using Method 21 of appendix A-7 of 40 CFR 60, the plan shall also include the following elements. For the purposes of complying with the fugitive emissions monitoring program using Method 21, a fugitive emission is defined as an instrument reading of 500 ppm or greater.
- (1) Verification that the monitoring equipment meets the requirements specified in Section 6.0 of Method 21 at 40 CFR part 60, appendix A-7. For purposes of instrument capability, the fugitive emissions definition shall be 500 ppm or greater methane using a FID-based instrument. If the Permittee wishes to use an analyzer other than a FID-based instrument, the Permittee shall develop a site-specific fugitive emission definition that would be equivalent to 500 ppm methane using a FID-based instrument (e.g., 10.6 eV PID with a specified isobutylene concentration as the fugitive emission definition would provide equivalent response to the Permittee's compound of interest).
  - (2) Procedures for conducting surveys. At a minimum, the procedures shall ensure that the surveys comply with the relevant sections of Method 21 at 40 CFR part 60, appendix A-7, including Section 8.3.1.
3. Each fugitive emissions monitoring plan shall include the elements specified in Condition IX.D.3(a) through (d) below, at a minimum, as applicable. [60.5397a(d)]
- a. A Sitemap.
  - b. A defined observation path that ensures that all fugitive emissions components are within sight of the path. The observation path shall account for interferences.

- c. If the Permittee is using Method 21, the plan shall also include a list of fugitive emissions components to be monitored and method for determining location of fugitive emissions components to be monitored in the field (*e.g.* tagging, identification on a process and instrumentation diagram, etc.).
  - d. The plan shall also include the written plan developed for all of the fugitive emission components designated as difficult-to-monitor in accordance with Condition IX.D.6.b, and the written plan for fugitive emission components designated as unsafe-to-monitor in accordance with Condition IX.D.6.c.
- 4. Each monitoring survey shall observe each fugitive emissions component, as defined in Condition IX.B.1 for fugitive emissions.

[60.5397a(e)]
- 5. The Permittee shall conduct an initial monitoring survey of the compressor station within 60 days of the modification.

[60.5397a(f)(2)]
- 6. A monitoring survey of each collection of fugitive emissions components at the compressor station shall be performed at the frequencies specified in Condition IX.D.6.a, with the exceptions noted in Conditions IX.D.6.b and c.

[60.5397a(g)]

  - a. A monitoring survey of the collection of fugitive emissions components at a compressor station within a company-defined area shall be conducted at least quarterly after the initial survey. Consecutive quarterly monitoring surveys shall be conducted at least 60 days apart.
  - b. Fugitive emissions components that cannot be monitored without elevating the monitoring personnel more than 2 meters above the surface may be designated as difficult-to-monitor. Fugitive emissions components that are designated difficult-to-monitor shall meet the following specification:
    - (1) A written plan shall be developed for all of the fugitive emissions components designated difficult-to-monitor. This written plan shall be incorporated into the fugitive emissions monitoring plan.
    - (2) The plan shall include the identification and location of each fugitive emissions component designated as difficult-to-monitor.
    - (3) The plan shall include an explanation of why each fugitive emissions component designated as difficult-to-monitor is difficult-to-monitor.
    - (4) The plan shall include a schedule for monitoring the difficult-to-monitor fugitive emissions components at least once per calendar year.
  - c. Fugitive emissions components that cannot be monitored because monitoring personnel would be exposed to immediate danger while conducting a monitoring survey may be designated as unsafe-to-monitor.



Fugitive emissions components that are designated unsafe-to-monitor shall meet the following specifications:

- (1) A written plan shall be developed for all of the fugitive emissions components designated unsafe-to-monitor. This written plan shall be incorporated into the fugitive emissions monitoring plan.
- (2) The plan shall include the identification and location of each fugitive emissions component designated as unsafe-to-monitor.
- (3) The plan shall include an explanation of why each fugitive emissions component designated as unsafe-to-monitor is unsafe-to-monitor.
- (4) The plan shall include a schedule for monitoring the fugitive emissions components designated as unsafe-to-monitor.

7. Each identified source of fugitive emissions shall be repaired or replaced in accordance with Conditions IX.D.7.a and b.

[60.5397a(a) and (h)]

- a. Each identified source of fugitive emissions shall be repaired or replaced as soon as practicable, but no later than 30 calendar days after detection of the fugitive emissions.
- b. If the repair or replacement is technically infeasible, would require a vent blowdown, a compressor station shutdown, or would be unsafe to repair during operation of the unit, the repair or replacement shall be completed during the next scheduled compressor station shutdown, or within 2 years, whichever is earlier.
- c. Each repaired or replaced fugitive emissions component shall be resurveyed as soon as practicable, but no later than 30 days after being repaired, to ensure that there are no fugitive emissions.
  - (1) For repairs that cannot be made during the monitoring survey when the fugitive emissions are initially found, the Permittee may resurvey the repaired fugitive emissions components using either Method 21 or optical gas imaging within 30 days of finding such fugitive emissions.
  - (2) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph shall be taken of that component or the component shall be tagged for identification purposes. The digital photograph shall include the date that the photograph was taken, shall clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).
  - (3) The Permittee that uses Method 21 to resurvey the repaired fugitive emissions components, is subject to the following resurvey provisions:

- (a) A fugitive emissions component is repaired when the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in section 8.3.3 of Method 21 are used.
  - (b) The Permittee shall use the Method 21 monitoring requirements specified in Condition IX.D.2.h(2), or the alternative screening procedures specified in section 8.3.3 of Method 21.
- (4) The Permittee that uses optical gas imaging to resurvey the repaired fugitive emissions components, is subject to the following resurvey provisions:
- (a) A fugitive emissions component is repaired when the optical gas imaging instrument shows no indication of visible emissions.
  - (b) The Permittee shall use the optical gas imaging monitoring requirements specified in Condition IX.B.2.g.

#### **E. Recordkeeping Requirements**

For each collection of fugitive emissions components at a compressor station, the Permittee shall maintain records identified in Conditions IX.E.1 through IX.E.3 below:

[60.5397a(i), 60.5420a(c)(15)]

1. The fugitive emissions monitoring plan as required in Conditions IX.D.1 through 3.
2. The records of each monitoring survey as specified below:
  - a. Date of the survey.
  - b. Beginning and end time of the survey.
  - c. Name of operator(s) performing survey. The Permittee shall note the training and experience of the operator.
  - d. Monitoring instrument used.
  - e. When optical gas imaging is used to perform the survey, one or more digital photographs or videos, captured from the optical gas imaging instrument used for conduct of monitoring, of each required monitoring survey being performed. The digital photograph shall include the date the photograph was taken and the latitude and longitude of the collection of fugitive emissions components at a compressor station imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital file, the digital photograph or video may consist of an image of the monitoring survey being performed with a

separately operating GPS device within the same digital picture or video, provided the latitude and longitude output of the GPS unit can be clearly read in the digital image.

- f. Fugitive emissions component identification when Method 21 is used to perform the monitoring survey.
- g. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.
- h. Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
- i. Documentation of each fugitive emission, including the information specified below:
  - (1) Location.
  - (2) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
  - (3) Number and type of components for which fugitive emissions were detected.
  - (4) Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.
  - (5) Instrument reading of each fugitive emissions component that requires repair when Method 21 is used for monitoring.
  - (6) Number and type of fugitive emissions components that were not repaired as required in Condition IX.D.7.
  - (7) Number and type of components that were tagged as a result of not being repaired during the monitoring survey when the fugitive emissions were initially found as required in Condition IX.D.7.c(2).
  - (8) If a fugitive emissions component is not tagged, a digital photograph or video of each fugitive emissions component that could not be repaired during the monitoring survey when the fugitive emissions were initially found as required in Condition IX.D.7.c(2). The digital photograph or video shall clearly identify the location of the component that must be repaired. Any digital photograph or video required under this paragraph can also be used to meet the requirements under Condition IX.E.2.e, as long as the photograph or video is taken with the optical gas imaging instrument, includes the date and the latitude and longitude are either imbedded or visible in the picture.
  - (9) Repair methods applied in each attempt to repair the fugitive emissions components.

- (10) Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.
- (11) The date of successful repair of the fugitive emissions component.
- (12) Instrumentation used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.

**F. Compliance Requirements**

**1. Initial Compliance Requirements**

The Permittee shall determine initial compliance with the fugitive emission standards for each collection of fugitive emissions components at the compressor station in accordance with the requirements in Conditions IX.F.1.a through e. The initial compliance period shall begin upon initial startup, and ends no later than 1 year after the initial startup date.

[40 CFR 60.5410a(j)]

- a. The Permittee shall develop a fugitive emissions monitoring plan as required in Conditions IX.D.1 through 3.
- b. The Permittee shall conduct an initial monitoring survey as required in Condition IX.D.5.
- c. The Permittee shall maintain the records specified in Condition IX.E.
- d. The Permittee shall repair each identified source of fugitive emissions for each affected facility as required in Condition IX.D.7.
- e. The Permittee shall submit the initial annual report for each collection of fugitive emissions components at the station compressor station as required in Conditions IX.G.3 and 4.

**2. Continuous Compliance Requirements**

To demonstrate continuous compliance, the Permittee shall comply with the requirements in Conditions IX.F.2.a through d:

[40 CFR 60.5415a(h)]

- a. The Permittee shall conduct periodic monitoring surveys as required in Condition IX.B.6.
- b. The Permittee shall repair or replace each identified source of fugitive emissions as required in Condition IX.D.7.
- c. The Permittee shall maintain records as specified in Condition IX.E.
- d. The Permittee shall submit the annual report for each collection of fugitive emissions components at the station compressor station as required in Conditions IX.G.3 and 4.

**G. Reporting Requirements**

1. Annual reports shall be submitted for each collection of fugitive emissions components at the compressor station. Multiple collection of fugitive emissions components at the compressor station may be included in a single annual report.  
[40 CFR 60.5397a(j)]
2. The initial annual report is due no later than 90 days after the end of the initial compliance period. The initial compliance period shall begin upon the initial startup of the new compressor station, and shall end no later than 1 year after the initial startup date. Subsequent annual reports are due no later than same date each year as the initial annual report.  
[40 CFR 60.5410a and 60.5420a(b)]
3. The report shall include the following general information:  
[40 CFR 60.5420a(b)(1)]
  - a. The company name, facility site name associated with the affected facility, and address of the affected facility. If an address is not available for the site, include a description of the site location and provide the latitude and longitude coordinates of the site in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.
  - b. An identification of each affected facility being included in the annual report.
  - c. Beginning and ending dates of the reporting period.
  - d. A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
4. For the collection of fugitive emissions components at each compressor station within the company-defined area, the report shall include the records of each monitoring survey including the information specified in Conditions IX.G.4.a through l below.  
[40 CFR 60.5420a(b)(7)]
  - a. Date of the survey.
  - b. Beginning and end time of the survey.
  - c. Name of operator(s) performing survey. If the survey is performed by optical gas imaging, The Permittee shall note the training and experience of the operator.
  - d. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.
  - e. Monitoring instrument used.
  - f. Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.

- g. Number and type of components for which fugitive emissions were detected.
  - h. Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h).
  - i. Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.
  - j. The date of successful repair of the fugitive emissions component.
  - k. Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.
  - l. Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.
5. The Permittee shall submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) The Permittee shall use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, The Permittee shall submit the report to the Administrator at the appropriate address listed in 40 CFR 60.4. Once the form has been available in CEDRI for at least 90 calendar days, The Permittee shall begin submitting all subsequent reports via CEDRI. The reports shall be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted.

[40 CFR 60.5420a(b)(11)]

## **H. Permit Shield**

Compliance with the conditions of this Section shall be deemed compliance with 40 CFR 60.5365a(j), 60.5370a(a) and (b), 60.5397a(a) through (j), 60.5410a(j), 60.5415a(h), 60.5420a(b), 60.5420a(b)(1), 60.5420a(b)(7), 60.5420a(c)(15), and 60.5430a.

[A.A.C. R18-2-325]



## ATTACHMENT “C”: EQUIPMENT LIST

**Air Quality Control Permit No. 61325 (as revised by Significant Permit Revision No. 70818)**  
**For**  
**El Paso Natural Gas Company, L. L. C. - Willcox Compressor Station**

<b>EQUIPMENT TYPE</b>	<b>MAX. CAPACITY</b>	<b>MAKE/ MODEL</b>	<b>SERIAL NUMBER</b>	<b>DATE of INSTALL/ MFG</b>	<b>EQUIPMENT ID NUMBER</b>	<b>NSPS/NESHAP APPLICABLE</b>
Gas Combustion Turbine	10,110 hp*	GE/ M3142R-J	226335	1977	Willcox C-1	No
Gas Combustion Turbine	10,110 hp*	GE/ M3142R-J	226001	1972	Willcox C-2	No
Emergency Generator SI-RICE 4SLB	1,085 hp	Caterpillar/ 3516SID	3RC00240	1991	Willcox C-Aux-1	40 CFR 63 Subpart ZZZZ
Gas Combustion Turbine	13,000 hp**	Solar/Mars 90-13000	TBD	2018	Dragoon A-01	40 CFR 60 Subpart KKKK
Emergency Generator SI-RICE	750-kW	TBD	TBD	2018	Dragoon A-Aux-1	40 CFR 63 Subpart JJJJ

\* capacity at site horsepower and 80°F

+ 13,000-hp maximum rated capacity assumes ISO conditions (59°F, 60% relative humidity, sea level, with no losses). Maximum rated capacity at site location is estimated to be approximately 12,604-hp